

Ross C. Goodman, Esq.  
Nevada Bar No. 7722  
GOODMAN LAW GROUP, P.C.  
520 S. Fourth Street, Second Floor  
Las Vegas, Nevada 89101  
Telephone: (702) 383-5088  
Facsimile: (702) 385-5088  
Email: [ross@goodmanlawgroup.com](mailto:ross@goodmanlawgroup.com)

Richard Bruce Herman (admitted *pro hac vice*)  
The Helmsley Building,  
230 Park Avenue, Suite 300  
New York, New York 10169  
Telephone: (917) 749-8888  
Email: [rbh@richardbherman.com](mailto:rbh@richardbherman.com)  
*Attorneys or Alan Shinderman*

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

## SECURITIES AND EXCHANGE COMMISSION.

Case No.: 2:23-cv-00288-APG-DJA

**Plaintiff.**

VS.

MARKMAN BIOLOGICS CORP. and ALAN SHINDERMAN

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
MOTIONS TO COMPEL**

## (Second Request)

**Defendant**

and

ASPEN ASSET MANAGEMENT  
SERVICES, LLC

## Relief Defendant

Defendant Alan Shinderman (“Mr. Shinderman”), by and through their undersigned counsel of record, and Plaintiff, Securities and Exchange Commission (“Plaintiff”), by and through their undersigned counsel of record, hereby stipulate and agree as follows:

1. There are ongoing discovery disputes in this case as reflected by the SEC's motion to compel (ECF No. 65), motion for leave to take a second deposition from Mr.

1 Shinderman (ECF No. 71), and motion to extend the time frame for discovery (ECF No. 72).

2       2. On September 13, 2024, the Court granted motions by Marquis Aurbach Chtd.  
 3 and Lucosky Brookman LLP to withdraw their representation of Defendants (ECF Nos. 61  
 4 and 62); granted motions by Marquis Aurbach and Lucosky Brookman LLP motion to extend  
 5 time (ECF No. 73) and motion to shorten time (ECF No. 74). ECF No. 76. The Court further  
 6 ordered Defendants to respond to SEC's recent discovery motions (ECF Nos. 65, 71, and 72)  
 7 by November 11, 2024.

8       3. On September 18, 2024, Attorney Ross C. Goodman entered an appearance in  
 9 this matter on behalf of Mr. Shinderman (ECF No. 77) and Attorney Richard Bruce Herman's  
 10 verified petition (ECF No. 78) for permission to practice pro vice in this matter on behalf of  
 11 Mr. Shinderman was approved on September 19, 2024, the Court granted. ECF No. 79.

12       4. The Parties met for a conference on November 5, 2024 to discuss additional time  
 13 familiarize with the details on this case, review additional discovery, and discuss settlement.

14       5. This Court granted [85] the Stipulation for Extension of Time [84] re [65] Motion,  
 15 [71] Motion, and [72] Motion making Responses due by December 11, 2024.

16       6. The Parties agreed on November 25, 2024 to a second 30-day extension for  
 17 Defendants to file a response to Plaintiff's Motion from December 11, 2024, to January 10,  
 18 2025.

19       7. As part of this extension, the parties request to continue the dispositive motion  
 20 deadline to sixty (60) days from the conclusion of fact discovery (if the Court grants one or more

21       ///

22       ///

23       ///

24       ///

1 of the SEC's pending motions (ECF Nos. 65, 71 and 72) or sixty (60) days from when the Court  
2 denies the SEC's motions to compel (ECF Nos. 65, 71 and 72).

3  
4 STIPULATED AND AGREED TO: this 10<sup>th</sup> day of December 2024.

5  
6 */s/ Edward J. Reilly, Esq.*  
By \_\_\_\_\_  
7 Edward J. Reilly Esq.  
Derek Bentsen, Esq.  
8 Ada Fernandez Johnson, Esq.  
Katherine H. Stella, Esq.  
9 100 F Street, NE  
Washington, DC 20549  
10 *Attorneys for Plaintiff Securities  
and Exchange Commission*

5  
6 */s/ Ross C. Goodman, Esq.*  
By \_\_\_\_\_  
7 Ross C. Goodman, Esq.  
Goodman Law Group, P.C.  
520 S. 4<sup>th</sup> Street, 2<sup>nd</sup> Fl.  
Las Vegas, NV 89101  
8 *Attorneys for Defendant Alan  
Shinderman*

12  
13 */s/ Richard B. Herman, Esq.*  
By \_\_\_\_\_  
14 Richard B Herman. Esq.  
The Helmsley Building  
15 230 Park Avenue, Suite 300  
New York, NY 10169  
16 *Attorneys for Defendant Alan  
Shinderman*

18 IT IS SO ORDERED.

19  
20   
21 DANIEL J. ALBREGTS  
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: 12/11/2024